



September 23, 2011

Ms. Marlene Dortch  
Office of the Secretary  
Federal Communications Commission  
455 12th Street SW  
Washington, DC 20554

RE: Acceleration of Broadband Deployment, WC Docket No. 11-59  
Reply to NextG Networks Comments filed on July 18, 2011

The State Historic Preservation Office for the District of Columbia (DC SHPO) offers these comments to the Federal Communications Commission in response to the Notice of Inquiry for WC Docket No. 11-59, released April 7, 2011, and comments submitted for the record by NextG Networks, Inc.

As a partner in the nationwide system of state historic preservation offices, the DC SHPO is responsible for implementing provisions of the National Historic Preservation Act of 1966 within the District of Columbia. The office is also an integral component of the DC Office of Planning and serves as the Historic Preservation Office (HPO) for the District of Columbia for the purposes of implementing the DC Historic Landmark and Historic District Protection Act of 1978 (DC Official Code §6-1101 *et seq.*).

In its comments dated July 18, 2011, NextG Networks, Inc., has identified various review processes in the District of Columbia, including reviews by the DC SHPO, as examples of “slow and problematic local permitting processes” that NextG has encountered, illustrating the “tangled web of unnecessary application obstacles that impede the deployment of wireless infrastructure, and ultimately broadband access.”

NextG’s comment that the timeline for navigating various review processes in the District of Columbia “can only be estimated in years” is speculation without factual basis. Instead, it appears from NextG’s comments that it is merely expressing its view that carriers are “unwilling” to commit to DAS network deployment in the District due to the “uncertain outcome” of various review procedures.

The federal and District government review procedures that apply to telecommunications and many other types of installations in the District reflect the reality of different

government jurisdictions in the nation's capital. These procedures derive from federal and local laws designed to promote sound urban planning and to protect the historic and aesthetic qualities of the national capital. Generally, these procedures are well established and oriented toward cooperative progress toward resolution without undue delay.

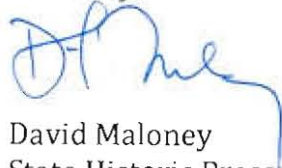
Telecommunications companies routinely submit applications to the DC SHPO for review of proposed installations, and we believe these reviews are accomplished without undue burden on applicants. As evidence, our records show that in 2009, the SHPO reviewed 68 telecommunications installations; in 2010, 103 installations; and between January 1 and September 15 of 2011, 79 installations. A total of 31% of these reviews were completed within 5 calendar days of submittal; 51% were completed within 15 calendar days; 11% were completed within 30 calendar days; and only 7% required more than 30 calendar days.

In order to assist telecommunications providers, we have also posted specific guidance on our website about how to submit applications for expeditious review. To help streamline the process and reduce paperwork, this guidance includes a list of the information that is *not* required for DC SHPO review, but that some companies routinely provide. This document may be found at:

<http://planning.dc.gov/DC/Planning/Historic+Preservation/Preservation+Services/For+Business+and+Government/Government+Project+Review/Cellular+Antenna+Installation+Review>.

Although we have not conducted an exhaustive search of our records, we are not aware of any NextG applications submitted to us for review. To our knowledge, NextG has never approached the DC SHPO with any complaints about our review process or any request to consult with us about ways to facilitate our review of their projects. We are always available to address review issues with any telecommunications provider, and are ready and willing to assist them in proceeding through our review procedures in a fair and efficient manner.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Maloney', with a long horizontal flourish extending to the right.

David Maloney  
State Historic Preservation Officer